SURREBUTTAL TESTIMONY OF

MARK C. FURTICK, P.E.

ON BEHALF OF

DOMINION ENERGY SOUTH CAROLINA, INC.

DOCKET NO. 2020-63-E

Q. PLEASE STATE YOUR NAME, BUSINESS ADDRESS, AND OCCUPATION.

A. My name is Mark C. Furtick. My business address is 220 Operation Way, Cayce, South Carolina. I am Manager of Renewable Energy Programs and Technical Services for Dominion Energy South Carolina, Inc. ("DESC").

Q. ARE YOU THE SAME MARK FURTICK THAT OFFERED DIRECT TESTIMONY IN THIS DOCKET?

A. Yes, I am.

Q. WHAT IS THE PURPOSE OF YOUR SURREBUTTAL TESTIMONY?

A. The purpose of my testimony is to address items raised by Bridgestone Americas Tire Operations, LLC ("BATO") in the rebuttal testimony of BATO Witness McGavran related to the solar generating facility ("Generating Facility") which BATO proposes to place into operation. I will explain that generators

operating in parallel—whether industrial, behind-the-meter, residential rooftop solar, or utility-scale—are subject to and processed in accordance with the South Carolina Standard. I will also explain why (i) the Generating Facility is very different from the stand-by generation cited in BATO's rebuttal testimony, (ii) DESC cannot simply permit the Generating Facility to operate in parallel based solely upon other previous events on the DESC system, and (iii) DESC cannot make an exception for even one project, regardless of size or nature of the DESC system.

Q. ON PAGE 2, LINE 19, THROUGH PAGE 3, LINE 6, BATO WITNESS MCGAVRAN CLAIMS THAT DESC BELIEVES ALL STAND-BY GENERATION AND CUSTOMER-OWNED GENERATION PLACED INTO SERVICE IS SUBJECT TO THE SOUTH CAROLINA STANDARD. DOES THIS ACCURATELY SUMMARIZE DESC'S POSITION?

A. No, this is a blatant mischaracterization of DESC's position and reveals a fundamental misunderstanding of the South Carolina Standard. Indeed, BATO Witness McGavran's summary of DESC's position is in direct conflict with page 6, lines 1-6, of my direct testimony, which essentially describes a stand-by generator, and stipulates that such a "stand-alone system, which may be referred to as a 'non-parallel' system" would not be subject to the South Carolina Standard. As such, I

am unsure why BATO Witness McGavran feels that is an accurate summary of DESC's position given this testimony.

To be clear, BATO Witness McGavran continues to make distinctions that are of no consequence to the South Carolina Standard. The South Carolina Standard does not distinguish between "customer generation" and "stand-by generation," just as it does not distinguish between a series connection or a parallel connection. The crucial factors are interconnection and parallel operation. Therefore, it is not DESC's position that all customer-owned generation and all stand-by generation would be subject to the South Carolina Standard. Unlike the Generating Facility, stand-by generation does not operate in conjunction with power supplied by DESC. Standy-by generation operates in isolation and not in parallel—such as during a power interruption when DESC is not flowing power—and such projects are not within the scope of the South Carolina Standard.

DESC has processed thousands of requests under the South Carolina Standard for residential customers utilizing rooftop solar and industrial, behind-the-meter, generation. In fact, I cannot think of a situation where any such generation—that is not stand-by generation only—would be placed into service on the DESC system without first following the South Carolina Standard. As such, even small projects like rooftop solar, which involve behind-the-meter generation that is meant to flow power in conjunction with DESC to the same premises—precisely the

operating posture of the Generating Facility—are subject to the South Carolina Standard.

By way of further explanation, although the South Carolina Standard does not distinguish by resource, the nature of solar is such that it would very rarely, if ever, be characterized as a stand-by generator not subject to the South Carolina Standard. Solar generation, by nature, is intermittent because it is largely reliant upon weather patterns. This means that solar generation may experience large, unexpected increases and drops in generation output. Given that stand-by generators must be ready when called upon because the facility would have no other source of power at the time, the intermittent nature of solar generation makes it ill-equipped to operate as a stand-by generator. Clearly, the Generating Facility is not a stand-by generator, and it is even more crucial that the South Carolina Standard apply here given that DESC would be flowing power in conjunction with such a variable power supply.

Q. ON PAGE 6 AND PAGE 7, BATO WITNESS MCGAVRAN POINTS TO INCIDENTS AT OTHER BATO FACILITIES TO JUSTIFY THE INTERCONNECTION AND PARALLEL OPERATION OF THE GENERATING FACILITY. DOES THE SOUTH CAROLINA STANDARD PERMIT GENERATORS TO INTERCONNECT AND OPERATE IN PARALLEL WITHOUT REVIEW SO LONG AS SUCH GENERATOR HAS

A TECHNICAL CHARACTERISTIC IN COMMON WITH OTHERS ON THE DESC SYSTEM?

A. No, it certainly does not. As an initial point, BATO Witness McGavran points to specific operations and technical characteristics, which would all be studied pursuant to the interconnection queue process. However, these references to other facilities (which do not incorporate solar generation) and specific events should not obscure the ultimate question that is before the Commission—is the Generating Facility subject to the South Carolina Standard? At its core, that is the issue around which this dispute revolves.

Regardless, nowhere does the South Carolina Standard permit DESC to allow a generator to operate in parallel based upon events on another part of the DESC system solely based on technical characteristics it may have in common with other facilities on the DESC system. The South Carolina Standard requires DESC to review each generator and the effects such generator would have on the DESC system prior to interconnection and parallel operation. A fundamental principle of this process is that DESC must review the specific characteristics of each such generator. BATO Witness McGavran's testimony points to "real-world proof" at another BATO facility in Aiken, South Carolina, to, apparently, conclude that the Generating Facility can be safely and reliably interconnected to the DESC system without any review or study under the South Carolina Standard whatsoever.

To be clear, this is a concept completely foreign to the South Carolina Standard. BATO Witness McGavran, through his testimony seems to bait DESC into analyzing the operating characteristics, engineering specifications, and corresponding effects on the DESC system in order to sidestep the initial threshold question of the applicability of the South Carolina Standard. However, just like all other generators in DESC's interconnection queue, these analyses will take place in accordance with the procedures set forth in the South Carolina Standard, and in no case are the results of the study and review process a pre-requisite to determining whether the South Carolina Standard applies. It would be inappropriate and unfair for DESC to take on such an evaluation at this point simply because BATO confuses the issue or "squeaks the loudest."

To illustrate the danger to the DESC system inherent in BATO Witness McGavran's preferred approach, I will provide an example. If the South Carolina Standard mandated that projects could bypass the study and review process, so long as DESC had another project with similar characteristics on the system already, this would mean that thousands upon thousands of rooftop solar customers would be exempt from the South Carolina Standard entirely given that one rooftop solar customer went through the South Carolina Standard and was placed on the DESC system.

Alternatively, what if the Generating Facility was not just under 2 MW, but was instead 20 MW? Would the interconnection customer be taken seriously saying

there is no need to process such a proposed facility under the South Carolina Standard based on the customer's load profiles or other interconnected generating facilities? Should DESC allow a 20 MW generator to operate on the DESC system without an executed interconnection agreement that spells out compliance with design and operating standards, like the IEEE standards? Certainly, the consequences of permitting such a generator to interconnect without review may be clearer at that size, but the need to study and review such generator, as well as have such generator contractually commit to follow industry standards and Good Utility Practices (as defined in the South Carolina Standard), is no more or less compelling based on size. The fundamental point is that the South Carolina Standard does not distinguish along those lines, but does require DESC to process all such generators—of whatever size or configuration—that intend to interconnect and operate in parallel under the South Carolina Standard.

Q. GIVEN YOUR RESPONSIBILITIES AND PAST EXPERIENCES AT DESC, CAN YOU EXPLAIN HOW BATO'S POSITION RELATES TO OTHER SIMILARLY-SITUATED GENERATORS WITH WHICH YOU HAVE DEALT?

A. DESC often gets questions from developers related to the queue process and requests to exempt certain projects from various requirements of the South Carolina Standard. Although I understand that each generator may look at their project in

isolation and believe that an exception for such project when compared to the entire DESC system would be appropriate, DESC is tasked with maintaining the entire DESC system. As discussed by DESC Witness Hammond and DESC Witness Raftery in his direct testimony, this is precisely why the South Carolina Standard is so important because it gives DESC the rules by which it must manage the interconnection queue in a non-discriminatory manner to ensure that DESC's entire system remains safe and reliable. If the Generating Facility were not subject to the South Carolina Standard, it would provide a path forward in the future for numerous generators, of any size, to interconnect and operate in parallel with DESC, while bypassing the (i) Commission and (ii) the study and review process DESC is required to undertake to ensure the DESC system can continue to operate safely and reliably upon interconnection.

Q. DOES THIS CONCLUDE YOUR SURREBUTTAL TESTIMONY?

A. Yes.